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Sent: Wednesday, September 19, 2007 2:42 PM
To: 'context@calwater.ca.gov'
Subject: 9-11 Draft Delta Vision Comments

Thank you for the opportunity to contribute to the Delta Vision process.

Sustainability. What shall we sustain in the Delta? The document envisions a balance between human and ecological needs, but we need a clearer understanding of what stays, and what goes. What does the Delta of this Vision look like? What will it do?

Sea level rise. Page 2, Lines 11-13 say that, "Rising sea levels will lead to intrusion of salt water further upriver in the Delta, altering the ecology of fish and plants and contaminating waters withdrawn for diversion to agriculture and urban uses." Variable salinity was the basis of the Delta ecology before flow was regulated and used for agriculture and water supply. The CVP and the SWP have learned to operate pretty well for salmonoids and there a number of introduced or invasive species also thrive in the new flow regime, but that seems to not benefit some other species, like smelt. If the Vision is not to restore historic conditions (Page 2, Line 23), which uses and species does it mean to keep? As for the influence of sea level rise, this is a factor that is beyond local control. Perhaps it will be successfully remedied on a global basis, and perhaps not. Good engineering practice would be to hope for the best, while planning for the worst. It should be accommodated as an engineering constraint.

Resiliency. The Vision frequently calls for the Delta to be managed for "resiliency" (beginning on Page 2, Line 32). Like "sustainable", it must be asked which parts of the system should be resilient? What are the limits of this resilience? The vision tries to avoid defining this by stating that it doesn't provide "prescriptions and targets," but if it is to be the document that guides Delta decision makers for any length of time, it must set some boundaries. Does resilience mean that a farm behind a failed levee will have production restored even if this means that fresh water may not be available for export or that some species must be sacrificed? Does it mean the opposite?

Table on Page 3. "New Design Principles" indicate that ecosystem and water use should be equal in the new paradigm, but the "equality" seems to go entirely to the environment in the "Future Conditions." Is the "Environmental Delta" the Vision?

Cause and effect. Page 4, Lines 37-43 site a "precipitous decline in fish populations" and link the dying fish to declining "Phytoplankton Primary Production" in Figure 2. One might conclude from Figure 2 that the appearance of corbula has led to a decrease in primary production in Suisun Bay, but it does not prove that primary production was ever at the levels of the other marshes shown, nor is linkage provided to declining fish species, nor is proof provided that all fish species are declining. The Vision should provide more documentation or remove suppositions that the lay reader cannot easily verify. The Vision also needs to set at least some some parameters here on what a "healthy Delta" looks like and what kind of variation is acceptable.

Need for storage. Page 9, Lines 19-21 indicate that the management framework for the Delta leads to over-subscription of fresh water. The problem lies more with the timing of flows through the Delta (which Vision Governance seeks to manage) and a lack of storage south of the Delta; because of the lack of storage, water must be pushed through the Delta during the summer - a time when flows would otherwise be diminishing. But, as the Draft Vision points out, the Delta is so complex (Page 9, Lines 37-38) that we cannot possibly foresee every possible outcome of a change in flow regime so, even if enough storage were available to meet all South-of-Delta needs and the most recent Wanger Decision allowed water through the Delta in the spring, some species other than the smelt still might suffer as those reservoirs were built and filled, and many conditions which are considered environmentally unacceptable would be maintained because of In-Delta fresh water demand. In short, if it is the Vision's intention to manage adaptively, just write it.

Water supply and environmental resources are in conflict. Page 10, Lines 21-22 contain the sentence, "Recent events have suggested that, far from being mutually exclusive goals protecting the water supply and ecosystem may only be achievable in tandem." This is not our impression. Quite the contrary, recent events have reinforced the supposition that water supply and ecosystem goals compete in a zero-sum game. In the Delta today, water is the only variable that can be readily controlled. Water can be released from dams upstream. Water can be pumped out by the projects. These same issues are raised on Page 12, Lines 24-25.

Governance. Page 15, Line 15 envisions a Delta Governance structure that "is responsive to society and major constituencies." This after lamenting that no governance structure has yet been established. Though this is a vision statement, the system proposed ensures continued stalemate as "major constituencies" with competing demands vie with one-another for resources and smaller interests band together and seek legal means to make their demands heard. If this vision were followed, it would be the only part of the current Delta that would be sustained. Perhaps this Vision would be better off with an even more vague description of Governance.

Vision. The Draft Vision seems to suffer from two shortcomings. First is that it is overly verbose. Once the Governor's mandate is laid out, it seems that only a few pages should suffice to list the what the future Delta will do and what it will look like. Second, this Vision doesn't really contain a vision.

Thank you again for the opportunity to contribute. We look forward to the final Delta Vision this fall.

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